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July 17, 2009

**VIA HAND DELIVERY**

Honorable Robert D. Drain  
United States Bankruptcy Court  
Southern District of New York  
One Bowling Green  
New York, New York 10004

Re: *In re Delphi Corporation, et al.,  
Debtors and Debtors-in-Possession,  
Chapter 11 Case No. 05-44481 (RDD)*

Your Honor:


This firm, as well as the firm of Miller & Chevalier Chartered, represent Dennis Black, Charles Cunningham, and the Delphi Salaried Retiree Association (collectively, "Salaried Workers") in connection with the above-referenced chapter 11 case.

On Wednesday, July 15, 2009, the Salaried Workers filed their Objection to Debtors' Proposed Modifications to Debtors' First Amended Plan of Reorganization ("Objection").

As Your Honor will note, on page 3 of the Objection the Salaried Workers reference a Complaint to enjoin the Excom (as defined in the Objection), which at the time was being prepared for filing in the United States District Court for the Eastern District of Michigan ("District Court of Michigan"). The Objection goes on to say that once the Complaint is filed in the District Court of Michigan, the Complaint will be filed with this Court.

On July 16, 2009, the Salaried Workers filed the Complaint with the District Court of Michigan. To that extent, enclosed herewith please find a copy of the Complaint. A copy of this letter and the Complaint will also be filed on the Court's Electronic Case Filing System. Furthermore, all parties that received a copy of the Objection will receive a copy of the Complaint by electronic mail, facsimile or overnight delivery.

Respectfully submitted,

  
Michael R. Dal Lago

MDL:imr  
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**MorrisonCohen**LLP

Pg 2 of 3

Honorable Robert D. Drain  
July 17, 2009  
Page 2

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Honorable Robert D. Drain  
July 17, 2009  
Page 3

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